21929

STATE OF COLORADO

COLORADO DEPARTMENT OF HEALTH
Dedicated to protecting and improving the health and environment of the people of Colorado

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Roy Romer
Governor

Patricia A. Nolan, MD, MPH
Executive Director

May 26, 1993

Mr. Richard J. Schassburger
U. S. Department of Energy
Rocky Flats Office, Bldg 116
P.O. Box 928
Golden, Colorado 80402-0928

RE: Industrialized Area IM/IRA

Dear Mr. Schassburger,

The Colorado Department of Health, Hazardous Materials and Waste Management Division (the Division), and the Environmental Protection Agency (EPA) hereby request that DOE develop and implement an Interim Measure/Interim Remedial Action (IM/IRA) for the Industrialized Area (IA) of the Rocky Flats Plant pursuant to Paragraph 150 of the IAG. This IM/IRA must accomplish the following:

1) Develop and implement a monitoring network for surface water, ground water, and air around the periphery of the IA, capable of detecting contaminant release or migration, which would operate until such time as the entire IA was remediated and buildings decontaminated and decommissioned, and

2) Develop and implement administrative and financial capability allowing DOE to respond, in a timely manner, to any contaminant release or migration from the IA before remediation and building decontamination and decommissioning is complete.

The agencies believe this IM/IRA is necessary because, as activities within the IA change to accomodate decontamination and decommissioning, the risk of contaminant release or migration may increase due to non-routine activities. This necessitates ongoing comprehensive monitoring of the IA.

The agencies request that a scoping meeting for this IM/IRA occur no later than June 18, 1993. In addition, we believe that a draft IM/IRA decision document should be submitted to the agencies for

ADMIN RECORD A-OU10-000132

review by December 31, 1993. Therefore, we request that your staff evaluate this request and notify us of the time and location for the first scoping meeting concerning this IM/IRA.

If you have any questions regarding these matters, please call Joe Schieffelin (CDH) at 692-3356 or Bill Fraser (EPA) at 234-1081.

Sincerely,

Gary W. Baughman, Chief
Facilities Section
Hazardous Waste Control Program

Martin Hestmark, Manager
Rocky Flats Team
Environmental Protection
Agency

cc: Daniel S. Miller, AGO
James K. Hartman, DOE
Wanda Busby, EG&G
Jackie Berardini, CDH-OE

Attachment 2

INTEGRATED OPERABLE UNITS IHSSs

11/24/93

OU #	IHSS #	DIMENSION	SIZE CRIT	BLDG %	BLDG #'s	ACCESS PHYSICAL FEATURES %	AFFECTED BY UTILITIES	PA IN/OUT	MEET SELECT CRITERIA	SCOPE/PROPOSED ACTIONS			
										DRILLING MW	DRILLING BH	DRILLING BAT	MISC
8	123.1	400x25	N	0		C, F, OHE		1	Y		18	9	
8	135	100X60	Y	0		75%PC, PA, T,Schedule for tank upgradess FY95		1	Y		4	2	
8	139.2	40x25	Y	0		40%PA, T, OHE, EQ	N	1	Y				
8	150.4	20x20	Y	0		100%PA, OHE, OHP		1	Y		12	6	
8	151	60x45	Y	0		100%PC, C, P, EQ,Diesel tank sched upgrade FY95		1	Y		5	2	
8	163.1	50x125	N	10	T771G	50%PA, OHE, 50% OUT FENCE, RD 207-C	N	1	Y		1		
8	163.2	60x40	Y	15	T771A	10%PA, OHE, EQ	N	1	Y				
8	173	125x40	N	60	NI only, 991	25%PA, EQ,DRUMS,SCRAP,PALETTES, 75%PC	N	1	Y		5	2	
8	184	50x75	Y	0	NI only	100%PA, EQ, DRUMS,STORM DRAIN	N	1	Y		5	2	
8	139.1N	25x25	Y	10		100%PA, 5%PC, T, EQ, OHE	N	1	Y				
8	139.1S	35x25	Y	0		40%PA, T, OHE, EQ	Y	1	Y				
8	118.1	25X40	Y	5	701	50%PA; OHP, C	Y	1	N		4	2	
8	118.2	30X20	N	0		100%PA;OHE,T		1	N		4	2	
8	137	140x100	N	40	712, 713	80%OHE, P,EQ, Blow Down	Y	1	N		10	5	
8	138	50x50	Y	0		30%P,OHE,		1	N		9	5	
8	150.1	60x360	N	10	771	100%PA, 5%OHE, EQ		1	N		13	6	
8	150.2	680X90	N	60	771, 776	20%PA, OHE,OHP, EQ,F		1	N		12	6	
8	150.3	150x30	N	0	771;Tunnel	SLOPING,P,PC,Enclosed Tunnel	Y	1	N		12	6	
8	150.6	125x180	N	25	705, 706	30%P,OHE,		1	N		12	6	
8	150.7	370X130	N	40	776, 778	50%PC, 50%PA,OHE, C, EQ(VV),T Limited access		1	N		13	5	
8	150.8	combined as part of IHSS 150.6							N				
8	172	4350x60	N	0	adj 771	100%PA, WETLANDS		1 - part	N				
8	188	110x65	Y	0		100%PA		1	N				
8	139.1N Tank	65X35	Y	0		F, 30%T, PCB CONTAMINATED, WETLAND	N	1	N				
8	144N	25x70	Y	0		P, OHP, C, EQ	N	1	N		14	7	
8	144S	15x170	N	0		100%PA, OHP		1	N		14	7	
8	150.5	deletion - same as IHSS 123.2 in OU9											

PA = Asphalt, PC = Concrete, OHE = Overhead Electrical, OHP = Overhead Pipe, P = Pipe, C = Columns, T = Tanks, EQ = Other Equip, WP = Well points, F = Fence, RR = Railroad Tracks, NI = Non-Intrusive 0 = Out Protected Area, 1 = In Protected Area, 2 = In Exclusion Area

OU #	IHSS #	DIMENSION	SIZE CRIT	BLDG %	BLDG #'s	ACCESS PHYSICAL FEATURES %	AFFECTED BY UTILITIES	PA IN/OUT	MEET SELECT CRITERIA	SCOPE/PROPOSED ACTIONS DRILLING MW	DRILLING BH	BAT	MISC
9	122	2x3000gal		50	441	Inspect, residue and soil samples		0	Y		14		
9	123.2	50x40		0	559	Accessible		1	Y		14		
9	124.1	1x30000gal		0	774	Inspect, residue and soil samples		1	Y		42		
9	124.2	2x14000gal			774	Inspect, residue and soil samples			Y				
9	124.3	2x14000gal			774	Inspect, residue and soil samples			Y				
9	125	1x14000gal		0	774	same as IHSS 124.1		1	Y		14		
9	126	2x25000gal		100	771	Inspect, residue and soil samples		1	Y		28		
9	127	60		0	774	Accessible for test pits		1	Y		14		
9	132	2x22500gal		100	776	Inspect, residue and soil samples		1	Y		14		
9	132	2x4500gal			776	Inspect, residue and soil samples			Y				
9	146	2x3000gal		100	774	Inspect, residue samples		1	Y		84		
9	146	4x6000gal			774	Inspect, residue samples			Y				
9	147.1	40x190		0	Portal 1	Accessible - parking lot		0	Y		14		
9	149	650		0	Pond 207A	Accessible, close to Solar Ponds		1	Y		14		
9	159	30x150		0	559				Y		14		
9	215	1xunk gal		100	774	Inspect, residue samples		1	Y				
9	121-P01	180		33	123	Outside portion accessible for test pits	N	0	Y				
9	121-P03	162		2	441	Accessible for test pits		0	Y				
9	121-P04	1773		0	444	Accessible for test pits		0	Y				
9	121-P05	1561		90	444	Outside portion accessible for test pits		0	Y				
9	121-P06	1300		46	881	Outside portion accessible for test pits		0	Y				
9	121-P07	440		81	881	Test pit access questionable		0	Y				
9	121-P09	504		19	883	Accessible for test pits		0	Y				
9	121-P10	1190		62	865	Outside portion accessible for test pits		0	Y				
9	121-P11	175		0	Portal 1	Accessible for test pits		0	Y				
9	121-P12	510		0	Portal 1	Accessible - fence area special case		1	Y				
9	121-P13	500		0	Portal 1	Accessible - fence area special case		1	Y				
9	121-P14	648		75	707	Outside portion accessible for test pits		1	Y				
9	121-P15	785		0	707	Accessible - tight area		1	Y				
9	121-P16	170		35	559	Accessible for test pits		1	Y				
9	121-P19	603		75	777	Outside portion tight but accessible		1	Y				
9	121-P21	386		20	771	Accessible		1	Y				
9	121-P23	410		0	771	Accessible		1	Y				
9	121-P24	306		4	771	Accessible		1	Y				
9	121-P25	562		12	774	Accessible		1	Y				
9	121-P26	2750		49	Pond 207A			1	Y				
9	121-P27	185		33	774	Accessible		1	Y				
9	121-P28	128		0	774	Accessible		1	Y				
9	121-P29	197		34	774	Accessible		1	Y				

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OU #	IHSS #	DIMENSION	SIZE CRIT	BLDG %	BLDG #'s	ACCESS PHYSICAL FEATURES %	AFFECTED BY UTILITIES	PA IN/OUT	MEET SELECT CRITERIA	SCOPE/PROPOSED ACTIONS DRILLING MW	BH	BAT	MISC
9	121-P34	198		100	774			1	Y				
9	121-P35	142		100	Pond 207C			1	Y				
9	121-P36	599		14	Pond 207A			1	Y				
9	121-P37	1449		7	779	Accessible for test pits		1	Y				
9	121-P38	800		14	Pond 207A			1	Y				
9	121-P39	1817		4	990	Accessible, has break area E of 782		1	Y				
9	121-P40	232		0	995	Accessible for test pits		1	Y				
9	121-P41	1537		68	779			1	Y				
9	121-P42	213		12	779			1	Y				
9	121-P43	100		0	777			1	Y				
9	121-P44	135		0	777			1	Y				
9	121-P45	130		0	779			1	Y				
9	121-P46	142		0	779			1	Y				
9	121-P47	135		0	Pond 207A			1	Y				
9	121-P48	193		66	Pond 207C			1	Y				
9	121-P49	85		0	Pond 207C	Accessible, close to Solar Ponds		1	Y				
9	121-P50	105		48	Pond 207B	Accessible, close to Solar Ponds		1	Y				
9	121-P56	170		0	774	Accessible		1	Y				
9	121-P57	112		0	123	Accessible		0	Y				
9	121-T01	1x800gal		0	122	Soil sample		0	Y				
9	121-T03	2x3000gal		50	441	Inspect, residue and soil sample		0	Y				
9	121-T04	3x60gal		100	444	Inspect, residue samples		0	Y				
9	121-T06	2x500gal		100	444	Inspect, residue samples		0	Y				
9	121-T08	2x25000gal		100	771	Inspect, residue and soil sample		1	Y				
9	121-T09	2x22500gal		100	777	Inspect, residue and soil sample		1	Y				
9	121-T10	2x4500gal		100	777	Inspect, residue and soil sample		1	Y				
9	121-T13	1x600gal		100	774	Inspect, residue samples		1	Y				
9	121-T14	1x30000gal		0	774	Inspect, residue and soil sample		1	Y				
9	121-T16	2x14000gal		100	774	Inspect, residue and soil sample		1	Y				
9	121-T18	1xUNKgal		100	776	Inspect, residue samples		1	Y				
9	121-T19	2x1000gal		100	779	Inspect		1	Y				
9	121-T20	2x800gal		100	779	Inspect		1	Y				
9	121-T21	1x250gal		100	886	Inspect, residue and soil sample		0	Y				
9	121-T22	2x250gal		100	886	Inspect, residue and soil sample		0	Y				
9	121-T23	1x6000gal		100	865	Inspect		0	Y				
9	121-T27	1x500gal		0	886	Soil sample		0	Y				
9	121-T28	2x1000gal		100	889	Inspect, residue samples		0	Y				
9	121-T29	1x200000gal		0	779	Inspect, residue and soil sample		1	Y				
9	121-T36	1x500gal		100	771	Inspect, residue samples		1	Y				

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9	121-T37	1x500gal		100	771	Inspect, residue samples		1	Y				
9	121-T38	1x1000gal		100	779	Inspect, residue samples		1	Y				
9	800-1200 PAC	120		0	881			0	Y				
9	121-P02	452		100	123	Inaccessible - under 123	Y	0	N				
9	121-P08	135		22	881	Questionable close to 881		0	N				
9	121-P17	1130		88	559	Questionable close to 559		1	N				
9	121-P18	150		89	707	Questionable close to 559		1	N				
9	121-P20	499		5	774	Questionable - close to 777, 778		1	N				
9	121-P22	1205		93	771	Inaccessible - 771 UBC		1	N				
9	121-P30	667		90	777	Inaccessible - under 777		1	N				
9	121-P31	167		100	774	Inaccessible - under 771		1	N				
9	121-P32	907		87	777			1	N				
9	121-P33	140		100	774	Inaccessible - under 771		1	N				
9	121-P51	170		100	778	Inaccessible - under 778		1	N				
9	121-P52	280		100	443	Inaccessible - under 443		0	N				
9	121-P53	78		17	881	Questionable - close to 881		0	N				
9	121-P54	138		0	881	Inaccessible - under 881		0	N				
9	121-P55	158		53	881	Questionable - close to 881		0	N				
9	121-T02	1x3000gal		100	441	Inaccessible - under 441		0	N				
9	121-T05	2x4000gal		100	444	Active		0	N				
9	121-T07	2x2000gal		100	559	Active		1	N				
9	121-T11	2x2000gal		100	707	Active		1	N				
9	121-T12	NA			-	Not valid location		NA	N				
9	121-T15	2x7500gal		100	774	Under 774		1	N				
9	121-T17	4x6000gal		100	774	Under 774		1	N				
9	121-T24	7x2700gal		100	887	Active		0	N				
9	121-T25	2x750gal		100	883	Active		0	N				
9	121-T26	3x750gal		100	883	Active		0	N				
9	121-T30	1x23000gal		100	707	Active		1	N				
9	121-T31	NA		NA	-	Invalid location		NA	N				
9	121-T32	1x132000gal		100	887	Active		0	N				
9	121-T33	NA		NA	-	Invalid location		NA	N				
9	121-T34	NA		NA	-	Invalid location		NA	N				
9	121-T35	NA		NA	-	Invalid location		NA	N				
9	121-T39	4x250gal		100	881	Already removed and cleaned		0	N				
9	San. Sewer	vast		varies				both	N				
9	UBC-123	150x180		100				0					
9	UBC-442	130x80		100				0					
9	UBC-444	420x300		100				0					

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										DRILLING			
										MW	BH	BAT	MISC
9	UBC-559	230x160		100				1					
9	UBC-707	300x460		100				1					
9	UBC-771	360x300		100				1					
9	UBC-774	150x140		100				1					
9	UBC-776	250x360		100				1					
9	UBC-779	210x220		100				1					
9	UBC-881	240x400		100				0					
9	UBC-883	210x250		100				0					
9	UBC-887	20x60		100				0					

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10	129	55x20	Y	0		IP, OHP,OHE,EQ		0	Y		5	2	
10	170	1000X250	N	0				0	Y		4	3	
10	175	40X40	Y	0				1	Y		2	2	
10	177	60X20	Y	100	885	OHE, 80%PA		0	Y		2	2	
10	181	30X20	Y	0				0	Y		2	1	
10	182	40X45	Y	20	453	100%PA		2	Y		2	1	
10	208	20X25	Y	0		40%PA,30%PC		2	Y		4	1	
10	210	30X30	Y	0		NO PICTURE		1	Y		4	1	
10	214	400X500	N	0		100%PA, OHE, OHP, F, EQ		1	Y		20	3	
10	174A	10X10	Y	0				0	Y		2	1	
10	174B	5X5	Y	0				0	Y		2	1	
10	176	300X400	N	6	964			1	N		5	3	
10	205	35X30	Y	50	460	80%PC, 20%PA, EQ, T, PARTLY IN BLDG.		2	N		1	1	
10	206	35X10	Y	0		OHE, EQ, F		1	N		2	1	
10	207	10X10	Y	0		100%PC		2	N		2	1	
10	213	450X300	N	0		100%PA,OHE, EQ		0	N		20	3	

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OU #	IHSS #	DIMENSION	SIZE CRIT	BLDG %	BLDG #'s	ACCESS PHYSICAL FEATURES %	AFFECTED BY UTILITIES	PA IN/OUT	MEET SELECT CRITERIA	SCOPE/PROPOSED ACTIONS DRILLING MW	BH	BAT	MISC
12	116.1	100X50	Y	20	448	40%PA, OHP, EQ,OHE	N	2	Y	1	2		
12	116.2	40X30	Y	0		100%PA, OHP, OHE	N	2	Y	1	2		
12	120.1	60X90	Y	30	668	10%PC, OHE, OHP, EQ, C, Stored materials	N	664 area	Y		2		WP = 3
12	120.2	45X150	N	5	664	80%PA, 10%PC, F, RR	N	2 - part	Y		2		WP = 3
12	136.1	50x75	Y	25	460	100%PA,Underground Electric Manhole	N	2	Y		2		
12	136.2	35X185	N	0		F,RR	N	2 - part	Y		2		
12	189	80X190	Y	0	NI only	10%T, EQ, RR, 3%PC, OHE, OHP, Limited Scope	N	2 - part	Y				
12	147.2	75X130	N	15	NI only	F, EQ, OHE			N				
12	157.2	750X600	N	65	444,447	OHE, OHP, EQ, C		2	N		8		WP = 10
12	187	665X25	Y	25	NI only,443	50%PA, F, OHP, OHE, T, EQ	N	2 - part	N				
12	147.1	Transferred to Operable Unit 9											

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13	117.2	160X510	N	0		100%PA, F,EQ		0	Y	1	3		
13	117.3	170X270	N	0		30%PC, 70%PA, F, 15%T		0	Y		3		
13	128	90X75	Y	10	335	25%PA		0	Y	2	3		
13	134	100X190	N	0		80%PA,		0	Y	2	6		
13	152	180X300	N	0		30%T, F		0	Y	2	3		
13	171	210X60	N	15	335	OHE, EQ		0	Y	1	3		
13	117.1	320x300	N	20	223, 549	10%PA, OHE, F, P		0	N	1	3		
13	148	100X190	N	90	123	100%PA		0	N	2	3		
13	157.1	200X520	N	0		PA,PC,OHE, OHP, F, Central Avenue Ditch		0	N	2	3		
13	158	200x275	N	30	551	100%PA, OHE, F		0	N	2	3		
13	186	40X650	N	5	552, 549	OHE, EQ		0	N	2	3		
13	169	NO FURTHER ACTION						0					
13	190	NO FURTHER ACTION						0					
13	191	NO FURTHER ACTION						0					

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14	156.1	370X180	N	0		100%PA, OHP, F		0	Y				
14	160	280X375	N	5	668	100%PA, P		0	Y	3	3		
14	164.1	40X75	Y	0		100%PA, OHE, OHP		0	Y		40		
14	131	10X50	Y	20	776	100%PA, OHP, T, EQ		1	N		19		
14	161	150X180	N	50	664	90%PA		664 Area	N	2	2		
14	162	50X1400	N	20	771, 776	90%PA, OHP, OHE		1 - part	N				
14	164.2	250X250	N	40	886	5%PC, EQ		0	N		40		
14	164.3	250X100	N	15	884	90%PC, OHP, OHE		0	N		40		

PA = Asphalt, PC = Concrete, OHE = Overhead Electrical, OHP = Overhead Pipe, P = Pipe, C = Columns, T = Tanks, EQ = Other Equip, WP = Well points, F = Fence, RR = Railroad Tracks, NI = Non-Intrusive 0 = Out Protected Area, 1 = In Protected Area, 2 = In Exclusion Area

INDUSTRIAL AREA OU INTEGRATION
IHSS EVALUATION

OUs 8,9,10,12,13,14

PURPOSE

The purpose of this effort is to evaluate the Industrial Area Operable Units (IA OUs) to determine a basis for scheduling of intrusive work activities (consistent with the Phase I RFI/RI Work Plans) following implementation of the non-intrusive field work in FY93 and FY94. In the most recent Five Year Plan intrusive field work of all the IA OUs were categorically linked to completion of transition and D&D efforts. The result of this assumption was that a majority of the intrusive work was pushed into the outyears by 5 years and as much as 22 years. Certainly, there are IHSSs that need to be deferred to completion of D&D, especially large IHSSs adjacent to buildings. However, there are several IHSSs that should not be linked to D&D efforts and based on historical knowledge these IHSSs would most likely require minimal intrusive work and may be closed. The main driver for this effort is to identify these select IHSSs for intrusive work that can be performed independent of D&D efforts and transition and move this work into the FY94 budgeting effort.

Also, funding levels in FY93 were inadequate to maintain compliance with the IAG milestones, this IHSS evaluation effort will provide the scope and schedule to support upcoming extension requests to the agencies for the IA OUs. Several factors that are considered for the IHSS evaluation are and part of the approach for scheduling and implementation of intrusive work for the IA OUs are:

- Current Funding and outyear funding levels
- Programmatic issues
- Transition and D&D interaction
- Physical access restrictions e.g. utilities
- Proposed intrusive activities
- Location and access
- OU Work Plan compliance

EG&G is evaluating each IA OU on an IHSS per IHSS basis. The information collected is being compared to a set of selection criteria used to provide the basis for estimating what work can be performed following the non-intrusive field work and what work should be deferred. The scope of each IA OU IHSS is limited to the anticipated initial stages of intrusive field work efforts used for producing the budget information for the Five Year Plan. The individual Phase I RFI/RI Work Plans also detail some intrusive work, but most of the intrusive efforts are to follow the results of the non-intrusive field work in FY93.

PROCESS

The IHSS evaluation is to serve as a decision tool for proposed intrusive work for the IA OUs. The main question that needs to be answered is which IHSSs should be linked to D&D effort and which IHSSs could be worked on immediately following the non-intrusive effort. This effort is designed to meet three goals and to based on as much factual information as possible. These goals are:

1. Demonstrate to EPA and CDH that investigation of the IA OUs is dependant on D&D

and transition efforts

2. Provide definitive guidance for outyear planning efforts and thus reduce last minute planning decisions that don't make sense

3. Provide a basis for requesting extensions for IAG milestones for the IA OUs.

Each IA OU has been evaluated on an IHSSs per IHSSs basis. The results of this effort are presented on the attached spreadsheets. The purpose of the information in the spreadsheet is to provide a basis for meeting selection criteria for evaluating each IHSSs and then making a decision to move intrusive work into FY94 or to have the work linked to D&D efforts. The IHSS data presented is based on information from the Phase I RFI/RI Work Plans, historical records, site photos, and field inspections. The idea is to provide the best information regarding the physical layout of the IHSS, location, access restrictions, paving, utility locations and security requirements. The information presented is a result of RPM's ongoing effort to date.

IHSS Selection Criteria

SIZE

The approximate dimensions of each IA OU IHSS are listed in the attached spreadsheet. The dimensions are given and used for the basis of selecting IHSSs on size alone. The overall assumption that applies to this selection criteria is that smaller IHSSs inherently require less intrusive field work and are more likely to be characterized earlier in the investigative process. Also, there is a higher probability that smaller IHSSs will meet closure criteria from implementation of the first stage of intrusive field work. Thus, further requirements for investigation or remediation may be met and the IHSS closed. Size selection criteria only relates to the layout and relative size of the IHSS. No consideration is given to the type of contaminants, location of utilities etc. Overall, large IHSSs would not meet the size selection criteria, thus the relative weight for selecting the IHSS for early characterization would be reduced. However, there still may be instances where larger IHSSs would be selected for early investigation. The rationale for selection of large IHSSs would be explained on a case-by-case basis. The specific criteria that an IHSS would be selected is as follows:

- The IHSS dimension must be less that 100 ft. by 100 ft. This dimension is used to describe relative area coverages. For example an IHSS measuring 150 ft. by 20 ft. would meet the size selection criteria because the area is less the given coverage dimension.

Note: IHSS dimensions listed in the spreadsheet are approximate. A majority of the IHSSs vary in shape and are not simply described as rectangular forms. The dimensions in the spreadsheet are listed as rectangular dimensions to provide total coverage of the IHSS and to simplify the IHSS selection process.

If the IHSS meets the above selection criteria, the IHSS is chosen for implementation of intrusive field activities. The size criteria accounts for roughly 25 percent of the total weight of the overall selection of the IHSS.

ACCESS

These criteria are mainly related to selecting an IHSS based on future D&D and transition efforts. The criteria and their associated weighting towards overall selection of the IHSS are:

- Surface Coverage (10%) - the type of IHSS surface material related to paving type i.e.

asphalt, concrete, natural or artificial fill materials, determined from aerial photos and field inspections.

- Utility Locations (10%) - concerned mainly with overhead types of utilities. Underground utilities are likely to be a problem anywhere in the industrial area. Specific utility maps are being evaluated but were not part of this selection criteria.

- Stored Material (15%) - consists of materials stored on IHSSs which can include equipment, hazardous and non-hazardous waste material, stocked materials, etc. Usually items stored on IHSSs can be moved or worked around.

All of the access criteria were evaluated on an IHSS per IHSS basis from historical data, work plan information and onsite field inspections. For this effort RPM perform field inspections on each IHSS of the IA OUs. The field inspections are the basis for estimating the access coverages and selection of the IHSS for intrusive activities. The main goal of the access criteria is to evaluate relative ease for performance of intrusive field work. For example if any IHSS is paved with concrete and utilities are identified in the IHSS then selection of the IHSS for early intrusive field work may not be possible, then investigation of the IHSS would be deferred until completion of D&D activities.

LOCATION

Two selection criteria are used for evaluation of IHSS location. The criteria and overall weighted percentages are as follows:

- Security Areas (15%) - is the IHSS located in or out of the Protected Area, Exclusion Zone or other security restricted areas.

- Building Coverage (25%) - some IHSS are adjacent to or are covered by buildings. This is a major criteria for relating IHSSs to D&D and transition activities. In the spreadsheet the IHSS building coverages are given in a percentage and then the appropriate building(s) are listed. If a building is not listed but a building percentage covered is listed, then the criteria is applied to other physical barriers e.g. a tank located in the IHSS, etc.

IHSS SELECTION

When an IHSS has been selected for intrusive field activities then the column in the spreadsheet "Meet Selection Criteria" is checked "yes". The spreadsheet was sorted on the "Meet Selection Criteria" column and the IHSSs are listed on an OU by OU basis are the ones selected for early intrusive field work. The other columns on the far right of the spreadsheet are the estimated scope of work for the IHSSs based on the Phase I RFI/RI Work Plans and outyear budgeting efforts. Overall, this IHSS selection effort is still in a "draft" stage and revisions will be made. As more information is collected the spreadsheets will be updated.